



U.S. Department of Justice

United States Attorney
Eastern District of New York

EAG/JDG

271 Cadman Plaza East
Brooklyn, New York 11201

August 23, 2012

By Hand Delivery

The Honorable Brian M. Cogan
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Thomas McLaughlin
Criminal Docket No. 09-849 (BMC)

Dear Judge Cogan:

The government respectfully submits this letter to request that the Court unseal the docket sheet in the above-captioned case, the defendant's waiver of indictment, the information filed against the defendant, and the transcript of the defendant's guilty plea proceeding on December 29, 2009, and that the defendant's true name be made available in the case caption. A proposed unsealing order is enclosed.


By way of background, on December 29, 2009, Thomas McLaughlin pleaded guilty under seal to racketeering conspiracy, in violation of 18 U.S.C. § 1962(d). At this time, the government requests that the Court unseal the docket sheet, the defendant's waiver of indictment, the information filed against the defendant, and the transcript of the defendant's guilty plea proceeding and that the defendant's true name be utilized in the case caption, rather than John Doe. The government respectfully submits that, in light of the fact that McLaughlin recently testified at trial in United States v. Gioeli, et al., 08 CR 240 (S-6) (BMC), there is no longer any risk to on-going investigations involving McLaughlin which require these documents to remain sealed.

In connection with this application, the government respectfully submits the enclosed proposed unsealing order.

Respectfully submitted,

LORETTA E. LYNCH
UNITED STATES ATTORNEY

By:


Elizabeth A. Geddes
James D. Gatta
Assistant U.S. Attorneys

Enclosure

cc: Stuart Grossman, Esq. (via e-mail)